

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-CV-00950-LO-JFA

PLAINTIFFS' PROPOSED JURY INSTRUCTIONS

Plaintiffs respectfully submit their Proposed Jury Instructions pursuant to Local Civil Rule 51. In accordance with Rule 51, Plaintiffs attach hereto one set of their Proposed Jury Instructions with citations of authority as Appendix A, and a second set without citations of authority as Appendix B.

Respectfully submitted,

Dated November 25, 2019

/s/ Scott A. Zebrak

Scott A. Zebrak (38729)

Matthew J. Oppenheim (*pro hac vice*)

Jeffrey M. Gould (*pro hac vice*)

Kerry Mustico (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

4530 Wisconsin Avenue, NW, 5th Floor

Washington, DC 20015

Tel: 202-480-2999

scott@oandzlaw.com

matt@oandzlaw.com

jeff@oandzlaw.com

kerry@oandzlaw.com

Attorneys for Plaintiff